

May 1, 2012



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Ave., NE
Washington, DC 20002

RE: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No. 03-109; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 12-23

Dear Secretary Dortch:

On behalf of 211US, please accept these comments regarding Lifeline and Link Up Reform and Modernization and responses to questions posed in the *Federal Register* dated March 2, 2012.

About 211US

211US is a national initiative of leading state and local 2-1-1 programs, United Way Worldwide and the Alliance of Information and Referral Systems (AIRS) to integrate the 240+ existing 2-1-1 service providers in the 50 states, Washington D.C. and Puerto Rico into a cohesive national system.

About 211 and the targeted population of Universal Service Program, Lifeline and Link Up

211 disproportionately serves the population targeted by the Lifeline and Link Up programs. Per the FCC order July 21, 2000 (FCC 00-256, Section 21, pages 14-15) to designate the abbreviated dialing code "211" for non-commercial community information and referral, 211 routinely:

- maintains detailed data about the full range of human services provided by government, community- and faith-based organizations;
- assesses needs of callers, discussing options and making appropriate referrals;
- follows up with a certain percentage of callers for quality assurance purposes;
- provides client-based advocacy under certain conditions; and
- reports on needs, available community resources and trends in the community.

In 2011, 211s across the country answered over 16.6 million calls, about a 1% increase on the previous year, during a time of reduced funding. Nationally, 211 Centers are answering calls equivalent to 5.3% of the US population and to the equivalent of 14.3% of US households (based on 211US stats and US Census, 2010 state summaries). The areas of need are represented on the graphic on page 4 of this letter. Because the most frequent needs for callers are "basic needs" (housing, shelter, utilities, food and financial assistance) and because the callers are disproportionately low-income, 211US is uniquely positioned to comment in this matter.

Comments

1. **211US praises the attention of the FCC to telecommunications services as fundamental to participation in society.** 211US applauds the FCC's continued attention to modernizing the universal service program, Lifeline and Link Up. Access to basic voice telecommunications

service should be considered a basic utility and required for participation in the economy and society. 211US further appreciates the FCC's attention to broadband as an increasingly more important service for participation in education, employment, healthcare and society.

211US has observed both trends—of the importance of telephone service to participation in society and of the explosive growth of wireless and non-wireline forms of access.

2. **Traditional ILEC (Incumbent Local Exchange Carrier) participation in Lifeline should not be optional.** 211US supports elements of comments filed by several state utility regulators related to required rather than optional participation (CA, DC, MI, OH, TN). Incumbent wireline providers should not be permitted to opt out of the Lifeline program until 100% of telecommunications consumers in a given geographic area are documented to have at least one affordable alternative Eligible Telecommunications Carrier (ETC) option. While the evidence may indeed show remarkable growth in wireless communications, we know that certain rural and low-income customers do not have access to reliable and affordable non-wireline alternatives where they reside.

Access to telecommunications provides access to a range of other health and human services, including critical services available through 211 and 911. Since access to these services is part of the rationale for Lifeline, it is reasonable to expect that all potential customers in a given geographic area should be provided access through ETCs.

3. **Additional methods of assessing eligibility for Lifeline should be pursued: WIC and Homeless Veteran status.** 211US supports Supplemental Nutrition Assistance Program for Women, Infants and Children (WIC) as administered by the US Department of Agriculture as a program conferring Lifeline eligibility for participants. During a time where many states are implementing further restrictions on or changes to eligibility for the three most frequently used forms eligibility determination (SSI, SNAP and Medicaid), it is critical that WIC eligibility be used for Lifeline eligibility. Additionally, homeless veterans should be allowed to provide an affidavit or statement of income in order to demonstrate eligibility for Lifeline for some period of time (a year was suggested in other comments). Telephone access for a homeless veteran is critical to accessing transition services, employment, health care, housing, counseling and more.
4. **Clear, easy-to-understand communications about eligibility determination, sharing of privacy information, services and costs are critical for consumers to access and understand Lifeline.** The FCC is seeking comment on National Database, Resale and Mandatory Application of Lifeline Discount to Bundled Service Offerings. While 211US has not developed policy positions regarding these issues, 211US advocates that resulting changes are clearly communicated, in plain consumer-friendly language, so that consumers understand how private information may be shared or accessed, how services may be transferred from one provider to another and how any discounts might be applied to single or bundled services.

Calls about consumer issues represent a small but not insignificant portion of the calls made to 211 centers around the country. Low-income individuals are frequently challenged to understand the myriad of services and related eligibility requirements--often because of barriers such as low literacy, non-native English proficiency, low financial or consumer literacy or documentation requirements.

Additional Information re: 211 and FCC Objectives in the Reform Order

While not directly covered in this Docket, we also would like to call your attention to the relationship between access to 211 and the FCC's goals as outlined in the *Reform Order*. With the rapid changes in telecommunications, it is challenging to ensure that all ETCs provide their customers access to 211 services. It is not uncommon that a consumer or a 211 center discovers that 211 is not activated (three-digit "211" is not translated to another 10-digit number) by an ETC or is not properly routed to the correct 211 center that provides 211 service for that customer's geographic service area. 211US asserts that ETCs should be required to ensure 211 service is activated appropriately, if 211 is to be available in their service area. By ensuring 211 accessibility, both the FCC and the ETCs would advance goals related to increased access to health and human services, particularly for low-income and vulnerable populations. This is increasingly more important during disasters, as 211 is often the promoted number during natural and manmade disasters.

Conclusion

211US applauds the FCC for advancing reforms with Lifeline program. 211US advocates continued ETC required participation in Lifeline and additional eligibility for WIC participants and homeless veterans. For any resulting changes, 211US advocates information is communicated to consumers in clear plain language, in a consumer-friendly manner.

Finally, 211US is interested in working with the FCC, state utility regulators and telecommunications providers alike in ensuring goals related to ensuring consumer access to health and human services information are met.

Please contact us if you need any additional information or documentation. You may reach Lucinda Nord at 317-921-1394 or Lucinda.nord@iauw.org, Linda Daily at 703-836-7112 x 474 or linda.daily@uww.unitedway.org or Bob Blancato at 202-789-0470 or rblancato@matzblancato.com.

Sincerely,

/s/ Lucinda Nord
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211US
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2-1-1 US: 2-1-1 Problem/Needs 2011 Final Report

National 2-1-1 Problem/Needs	2009 % of total	2010 % of total	2011 % of total	2011 Total problem/needs
Housing & Utilities	26.6%	25.1%	24.7%	4,124,606
Food & Meals	10.0%	12.0%	13.2%	2,205,681
Information Services	13.3%	10.3%	11.3%	1,878,913
Legal, Consumer & Public Safety	5.8%	8.0%	10.5%	1,743,871
Individual, Family & Community Support	6.6%	9.0%	9.1%	1,512,133
Income Support & Assistance	10.2%	10.0%	8.3%	1,390,429
Mental Health & Addictions	5.7%	6.3%	6.6%	1,103,674
Health Care	9.2%	6.3%	5.3%	885,273
Clothing, Personal and Household	3.2%	3.0%	2.8%	463,476
Other Government / Economic Services	2.0%	2.7%	1.8%	296,758
Transportation	1.6%	1.9%	1.6%	271,751
Employment	1.7%	1.6%	1.2%	203,396
Education	1.5%	1.4%	1.2%	193,393
Volunteers & Donations	1.0%	1.4%	1.0%	168,385
Disaster Services	1.2%	0.9%	1.0%	171,720
Arts, Culture & Recreation	0.3%	0.4%	0.4%	58,351
Total reported problem/needs	16,233,725	16,400,995		16,671,811

